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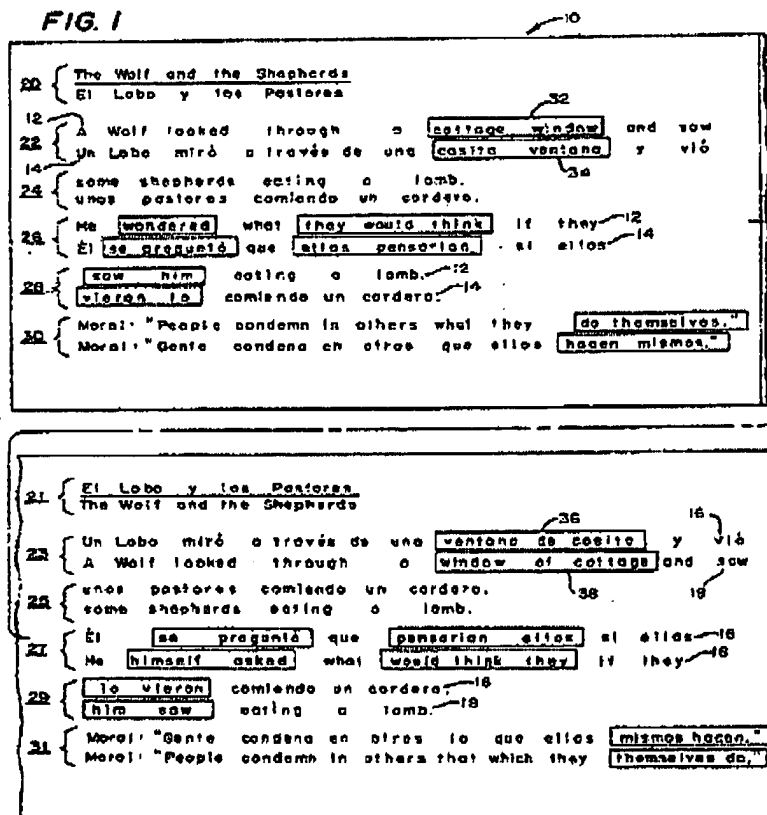
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From: Monica Gamez Legal Assistant to Iris Mok	No. of Pages Including Cover Sheet: 17
Message: Transmitted herewith: <ul style="list-style-type: none">• Transmittal Document; and• Response to Office Action.	
Re: Application No. 09/753,988 Attorney Docket No: RSW920000150US1	
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in identifying the accuracy of the translations between the source and the target language, as alleged by the Office Action.

To the contrary, as described at column 4, lines 17-30, Watkins is interested in presenting an entire paragraph or story in which the title, phrases, or sentences are set forth sequentially in groups with each group including first, second, third and fourth presentations consistent with each of the other groups for the ease of understanding of the translations being made, whether they are word-for-word translations or proper grammar and syntax translations, so that understanding is facilitated and teaching is thereby aided. Therefore, Watkins has no need to specify until when or to what condition translations will terminate, because Watkins merely focuses on a teaching aid that presents four presentations for users to understand the translations and rules associated with the translations, as opposed to identifying the accuracy of the translations as alleged by the Office Action.

Figure 1 of Watkins, which describes the four presentations, is shown below:



As shown in Figure 1, Watkins teaches a first presentation 12 with a group of words that is presented in a first language and a second presentation 14 with a word-for-word translation presented in a second language. The second presentation 14 follows closely with the presentation of the first language and is aligned word-for-word for increased understanding of the translation of each word being presented. Also shown in Figure 1, Watkins teaches a third presentation 16 of an accurate and grammatically correct translation of the first presentation 12 and is arranged correspondingly with the first presentation for ease of understanding of the translation being made. A fourth presentation 18 of a word-for-word translation of the third translation from the second language to the first language is made. This fourth presentation is also aligned with the third presentation in the same fashion as the first and second presentations. (Column 3, line 40 to column 4, line 15)

Thus, Watkins teaches a teaching aid that presents translations between a first language and second language sequentially using four presentations for the ease of user understanding of the translations that are being made. There is no condition specified as to when the translations will terminate. This is contrary to the presently claimed invention, which repeatedly translates and retranslates between a source and a target language until a current source language text is not reasonably equivalent to the original source language text or until an iteration threshold is reached, such that the quality of the translation may be determined for each iteration of the translations. Therefore, Watkins does not teach or suggest repeatedly translating and retranslation until a current source language text is not reasonably equivalent to the original source language text or until an iteration threshold is reached, as recited in claims 1, 10, and 19 of the present invention.

In addition, Watkins does not teach or suggest an iteration threshold, as recited in claims 1, 10, and 19 of the present invention. The Office Action admits that Watkins does not explicitly teach an iteration threshold, but the Office Action alleges that one of ordinary skill in the art will appreciate the advantage of having iteration threshold for the simple reason of setting a condition where the back and forth translation is limited. Applicants respectfully disagree.

There is no teaching or suggestion of an iteration threshold in Watkins. At column 4, line 47 to column 5, line 8, Watkins teaches that the presentation of the

teaching aid may be made in multiple volumes. The phrases and sentences on each of the corresponding pages in the volumes also correspond in arrangement, order, numbering and/or lettering, so that it performs a function of teaching aid giving the user easy access to both the word-for-word translation and the grammatically and syntactically correct translation as desired.

However, nowhere in the above section, or any other section, of the reference does Watkins teach or suggest an iteration threshold. Watkins is not interested in keeping track of the number of translations performed in order for the user to understand the translations and the translation rules. Watkins merely arranges the presentation of the translations in a number of volumes that best aids the user in learning the rules and art of translations between various languages. Watkins does not even have the need for an iteration count, because Watkins is not interested in determining the number of translations to be performed by the teaching aid. Watkins is only interested in presenting the translations in a manner that best aids the user in learning the translation and associated translation rules. Therefore, a person of ordinary skill in the art would not have been motivated to modify Watkins' teaching to arrive at an iteration threshold, because there is simply no teaching or suggestion in Watkins to keep track of the number of translations or to set a condition to limit the number of translations, as alleged by the Office Action.

Furthermore, Watkins does not teach or suggest identifying the translation as low quality if the current source language text is not reasonably equivalent to the original source language text, as recited in claims 1, 10, and 19 of the present invention. Nowhere in the reference does Watkins identify the quality of the translation between the source language and the target language. As discussed in the Abstract, Watkins teaches a second presentation in a second language that is a "word-for-word translation" of the words, phrases or a sentence presented in the first language, and a third presentation in the second language of an "accurate translation" of the first presentation according to the normal rules of syntax and grammar of the second language. At column 3, lines 5-15, Watkins teaches that an "accurate translation" or a "correct translation" is one that conveys a meaningful translation using appropriate syntax and grammar for each language used. The degree of accuracy and correctness may vary depending upon the

skills of the teacher or manufacturer of the teaching aid. Watkins further teaches that the concept of "accurate translation" is distinguishable from the word-for-word translation which does not focus on the contextual meaning of the proper application of rules of syntax and grammar.

Thus, Watkins merely translates either "word-for-word" from a first language to a second language or "accurately translates" from a first language to a second language based on the proper rules of syntax and grammar. Watkins does not identify the translation as low quality between a source language and target language if the current source language text is not reasonably equivalent to the original source language text. In fact, Watkins is not interested in how reasonably equivalent the translation is between the first and the second language. Rather, Watkins is only interested in translating "word-for-word" or according to the rules of syntax and grammar, so that the user may understand the translation and the rules of syntax and grammar. Therefore, Watkins also does not teach or suggest identifying the translation as low quality if the current source language text is not reasonably equivalent to the original source language text, as recited in claims 1, 10, and 19 of the present invention.

In view of the above, Applicants respectfully submit that Watkins does not teach or suggest the features of claims 1, 10, and 19. At least by virtue of their dependency on claims 1 and 10 respectively, Watkins does not teach or suggest the features of dependent claims 2-3, and 11-12. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 1-3, 10-12, and 19 under 35 U.S.C. § 103(a).

Independent claim 4, which is representative of claims 13 and 20 with regard to similarly recited subject matter, recites:

4. A method for measuring quality of machine translation, comprising:
 - a) receiving an original source language text $SHLx_0$;
 - b) setting a counter i to zero;
 - c) performing machine translation on source language text $SHLx_i$ to form target language text $THLy_i$;
 - d) performing machine translation on target language text $THLy_i$ to form source language text $SHLx_{i+1}$;
 - e) increment i by one; and
 - f) repeat steps (c) through (e) until $SHLx_i$ is not reasonably equivalent to $SHLx_0$ or until i reaches an iteration threshold. (emphasis added)

Watkins does not teach the features emphasized above. Nowhere in the reference does Watkins teach or suggest setting a counter i to zero, or incrementing i by one after c) performing machine translations on source language text to form target language text and d) performing machine translation on target language text to form source language text. As discussed in arguments presented for claims 1, 10, and 19, Watkins is not interested in keeping track of the number of translations. Watkins is only interested in displaying translations in four presentations in order for the user to understand the translations being made and the translation rules. Therefore, Watkins does not teach or suggest setting a counter i to zero or incrementing the counter by one after performing translations.

In addition, Watkins does not teach repeating the performing steps c) and d) and the incrementing step e) until $SHLx_i$ is not reasonably equivalent to $SHLx_0$ or until i reaches an iteration threshold. As discussed in arguments presented for claims 1, 10, and 19, Watkins does not teach an iteration threshold, since Watkins is not interested in limiting the number of translations. In addition, Watkins is not interested in how reasonably equivalent the translation is between the first and the second language. Rather, Watkins is only interested in translating "word-for-word" or according to the rules of syntax and grammar. Therefore, Watkins fails to teach or suggest repeating the performing steps c) and d) and the incrementing step e) until $SHLx_i$ is not reasonably equivalent to $SHLx_0$ or until i reaches an iteration threshold, as recited in claims 4, 13, and 20 of the present invention.

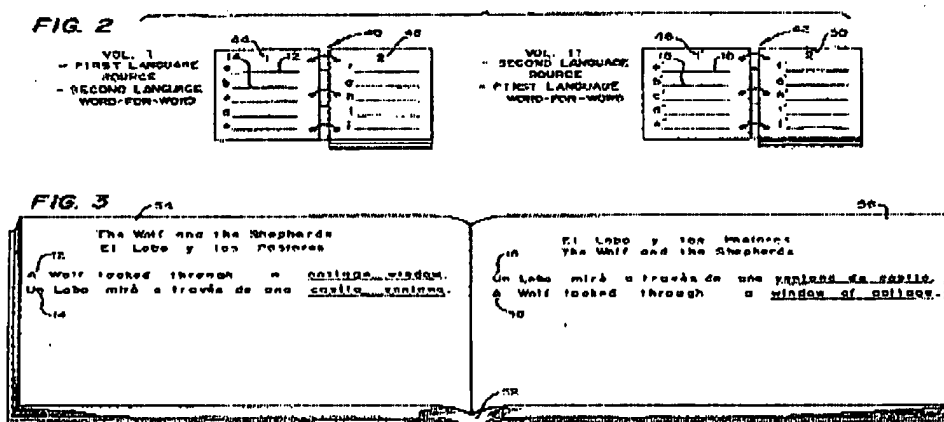
Furthermore, a person of ordinary skill in the art would not have been motivated to modify Watkins' teaching to arrive at the presently claimed invention, because there is simply no teaching or suggestion of a counter, let alone setting a counter to zero and incrementing the counter by one after performing the translations c) and d), as recited in claims 4, 13, and 20 of the present invention.

Accordingly, Applicants respectfully submit that Watkins does not teach or suggest the features of claims 4, 13, and 20. At least by virtue of their dependency on claims 4 and 13 respectively, Watkins does not teach or suggest the features of dependent claims 5-9 and 14-18. Accordingly, Applicant respectfully requests the withdrawal of the rejection of claims 4-9, 13-18, and 20 under 35 U.S.C. § 103(a).

In addition, Watkins does not teach or suggest the specific features as recited in dependent claims 2-3, 5-9, 11-12, and 14-18. For example, with regard to claims 5-9, which are representative of claims 14-18 with regard to similarly recited subject matter, Watkins does not teach or suggest identifying the target language text as low quality if a source language text SHL_x is not reasonably equivalent to the original source language text (claim 5), wherein SHL_x is reasonably equivalent to SHL₀ if SHL_x is similar in size within a given threshold to SHL₀ (claim 6), if SHL_x contains the same number of words as SHL₀ within a given threshold (claim 7), if SHL_x contains the same set of keywords as SHL₀ within a given threshold (claim 8), and if SHL_x generates the same Translation Confidence Indices as SHL₀ within a given threshold (claim 9).

As discussed above in arguments presented for claims 1, 10, and 19, Watkins does not teach or suggest identifying the target language text as low quality if a source language text SHL_x is not reasonably equivalent to the original source language text, because Watkins is not interested in how reasonably equivalent the translation is between the first and the second language. Rather, Watkins is only interested in translating "word-for-word" or according to the rules of syntax and grammar. Therefore, Watkins does not teach the features of claims 5 and 14 of the present invention.

In addition, the Office Action alleges that Watkins teaches the features of claims 6-9 and 15-18 in Figures 1 to 3, where the original source language is compared with the translated source language and where different outcomes are obtained. Figures 2 and 3 of Watkins are shown below:



As shown in **Figure 2**, Watkins teaches presenting the teaching aid in two presentation volumes **40** and **42**. In the first volume **40**, the first language is the source language and a word-for-word translation is provided in a second language. In the second volume **42**, the second language is the source language and a word-for-word translation is provided in the first language. As shown in **Figure 3**, Watkins teaches a single volume or book that is arranged such that there are presentations of source languages, such as **12** or **16**, and word-for-word translations, such as **14** or **18**. Watkins teaches that with this arrangement, the user can view all the presentations by simple eye movement. In addition, Watkins teaches that this arrangement facilitates and aids the user in learning the rules and art of translations between various languages.

However, nowhere in **Figures 2** and **3** above, or any other figures, in the reference does Watkins teach or suggest if the source language text $SHLx_1$ is similar in size, contains the same number of words, contains the same set of keywords, and generates the same Translation Confidence Indices, as the original source language text $SHLx_0$ within a given threshold, as recited in claims 6-9 and 15-18 of the present invention. In fact, Watkins does not even compare the original source language text $SHLx_0$ and the source language text $SHLx_1$ based on any criteria.

In **Figures 2** and **3**, Watkins merely teaches displaying the translations between the first and second language in two volumes or a single volume for the user to view all the presentations, such that the user may easily learn the rules and the art of translations. Watkins does not teach or suggest comparing the first language text to the second language text based on any criteria. Since Watkins fails to teach or suggest comparing the original source language text to the source language text based on any criteria, Watkins does not and would not teach if the source language text $SHLx_1$ is similar in size, contains the same number of words, contains the same set of keywords, and generates the same Translation Confidence Indices, as the original source language text $SHLx_0$ within a given threshold, as recited in claims 6-9 and 15-18 of the present invention.

Thus, in addition to their dependency on claims 1, 4, 10, and 13, respectively, Applicants respectfully submit that Watkins does not teach or suggest the specific features of claims 2-3, 5-9, 11-12, and 14-18. Accordingly, Applicants respectfully

request the withdrawal of rejections to claims 2-3, 5-9, 11-12, and 14-18 under 35 U.S.C. § 103(a).

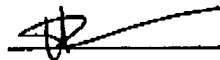
II. Conclusion

It is respectfully urged that the subject application is patentable over Watkins (U.S. Patent No. 5,486,111) and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 12/16/04

Respectfully submitted,



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